Comments on the Draft Report
by the California Council on Science and Technology
"Health Impacts of Radio Frequency from Smart Meters"

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Abstract

The draft report by the California Council on Science and Technology (CCST) does not appear to answer the questions asked of it by the requesting elected officials. Furthermore, rather than being an independent, science-based study, the CCST largely cuts and pastes estimates from a brochure by the Electric Power Research Institute, an industry group, issued some weeks earlier. The EPRI estimates appear incorrect in a number of regards. When two of the most central errors are corrected – the failure to take into account duty cycles of cell phones and microwave ovens and the failure to utilize the same units (they should compare everything in terms of average whole body exposure) **the cumulative whole body exposure from a Smart Meter at 3 feet appears to be approximately two orders of magnitude higher than that of a cell phone, rather than two orders of magnitude lower.**

It is strongly recommended that CCST revise its Draft Report and conduct actual measurements of cell phone, microwave oven, and SmartMeter RF cumulative whole body power densities. If measurements aren't made, then rigorous calculations correcting for cell phone and microwave oven duty cycles and whole body exposures should be made.

A summary figure below shows how rough estimates of the effect of those corrections suggest SmartMeters may produce cumulative whole body exposures far higher than that of cell phones or microwave ovens.

[1] The assistance of two UCSC student research assistants, Bailey Hall and Catherine Wahlgren, in the preparation of this review is gratefully acknowledged.

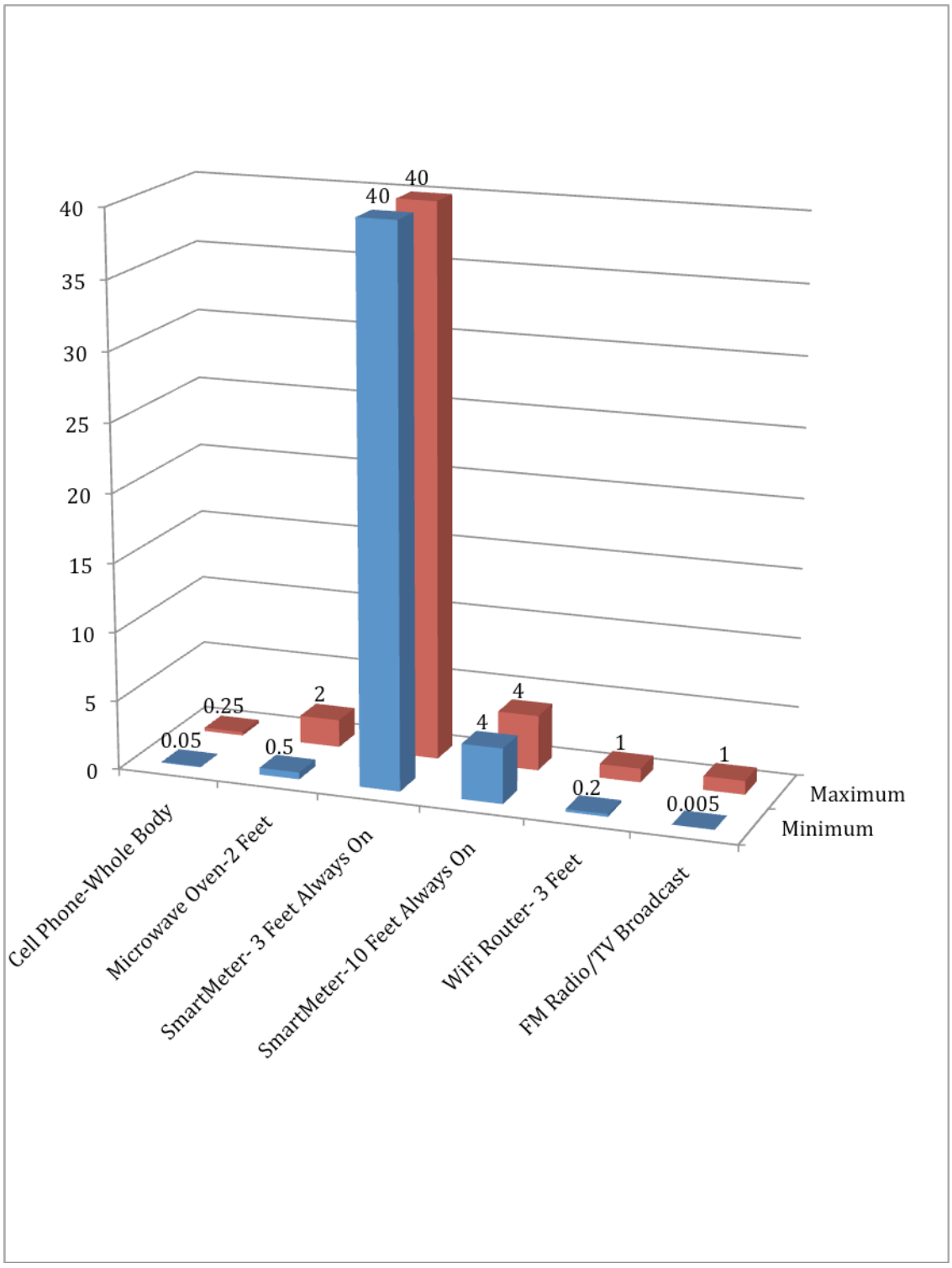

Figure A. Comparison of Radio-Frequency Levels to the Whole Body from Various Sources in $\mu W/cm^2$ over time [corrected for assumed duty cycle and whole body exposure extrapolated from assumed cell phone dose at ear].

On 30 July 2010 Assemblymember Jared Huffman requested that CCST undertake an "independent, science-based study" of two questions: "whether FCC standards for SmartMeters are sufficiently protective of public health taking into account current exposure levels to radiofrequency and electromagnetic fields, and further to assess whether additional technology specific standards are needed for SmartMeters and other devices that are commonly found in and around homes, to ensure adequate protection from adverse health effects."

Unfortunately, the Council draft report answers neither question.

In September, Assemblymember William Monning and Mill Valley Mayor Stephanie Moulton-Peters joined in the request, asking in particular that CCST review the central issue associated with the current FCC standards, which are decades old and based solely on protecting against prompt thermal effects (heating of tissue)—that they fail to take into consideration long-term and cumulative exposures to these devices and potential non-thermal health impacts (e.g., latent cancers).

Again, the Council's draft report provides little if any useful information or analysis of this matter. There is no mention or analysis of the specific studies that have suggested, for example, a cancer effect from RF exposure such as the large, international study funded by the cell phone industry, the Interphone study, that found a significant increase in brain cancers in people who used cell phones half an hour a day for ten years. Given the long latency period generally for solid cancers, such a finding gives pause as to what might be seen over the long term. Some other studies have suggested an increased risk of brain cancer on the side of the head where the cellphone is normally used. Other studies, however, have not found an effect. Given the nature of the request from the elected officials for a review of this critical scientific issue—whether there is the potential for non-thermal health effects from cumulative, long-term exposure to RF radiation—one would have hoped that there would have been a more detailed analysis of this question in the report.

The report is candid, however, that at present the issue is unresolved. But it goes on to then say there is no basis for changing the FCC standards which are based only on prompt, thermal effects. One could equally well say there is no basis for maintaining the FCC standards, given the uncertainties about latent, non-thermal effects.

What the CCST draft report does focus on, however, is the relative exposure from SmartMeters compared to other RF-emitting devices in common use. Here, again, the draft report disappoints. The elected officials cited claims made by the electric utility industry regarding safety of SmartMeters and purportedly relative low exposures compared to other common devices and requested "an independent, science-based study."

However, the CCST draft report does not appear to include much if any independent work on the subject but rather merely pastes in a table taken from an 8-page pamphlet released a few weeks earlier by the Electric Power Research Institute (EPRI), an advocacy group for the

electric power industry.[2] This EPRI table and the graph made from it constitute the core of the CCST report, and is reproduced here as Figure 1.

The EPRI pamphlet is not a peer-reviewed scientific study. It is a brief item for an advocacy group that is supported by industry. If the elected officials wanted the industry's views, it would have asked for them. Instead, it wished an independent, science-based study by an entity without the kinds of conflicts of interest EPRI has on this matter. But the CCST draft report is basically simply a cut-and-paste job from the EPRI brochure.

Note also that the estimate for exposure from a single SmartMeter contained in the EPRI item and repeated in the CCST draft is not a measured value but estimated—how is not made clear. EPRI's measurements were for a bank of ten SmartMeters; it didn't measure one alone but somehow estimated for it, despite the difference in how exposure falls off from one versus ten. The latter is inverse of the distance, the former inverse square of the distance. One presumes the electeds wanted actual measured values from an independent source, not a calculated value from the electric industry, without even an explanation of how it is was calculated and without independent verification.

CCST does correct one error made in the EPRI brochure whereby it reduced the presumed power density estimates for the SmartMeter by duty cycles of 1 and 5%. CCST rightly indicated that future duty cycles could be much higher as "new applications and functionality are added to the meter's communication module in the future." For this reason, it assumed a 100% duty cycle in its calculations.

HOWEVER, CCST did not correct numerous other apparent errors from the EPRI brochure when it adopted EPRI's values. For example, for cell phone exposures, CCST did not correct for the presumed duty cycle of the cell phone (which CCST indicates on average is 1%). Nor did it convert the EPRI cell phone power density estimate into comparable units. EPRI (and thus CCST) compared a *whole body average* exposure to SmartMeter radiation to *peak exposure to the ear* for the cell phone. One needs to compare apples and apples, or whole body exposures to whole body exposures. Comparing the peak dose to the ear from a cell phone, when the rest of the body gets vastly less radiation, with a whole body exposure where all organs get roughly the same dose from a SmartMeter, doesn't seem appropriate. If there is a cancer effect, it is likely associated with the total RF energy the body receives.

Similar apparent errors were made in the comparison to microwave ovens. Again, the duty cycle of the microwave oven is ignored. It is used perhaps fifteen minutes a day, and it is unlikely people are 2 feet away from the device for the full time it is on. Its "down time" must be included if one is looking, as requested by the elected officials, at potential cumulative, long-term exposures.

[2] The EPRI brochure was apparently released on November 17, providing little if any time for serious review of it by CCST prior to the release a few weeks later (with the holidays intervening) of the CCST report on which it was based.

[Additionally, the values given for microwave oven exposures by EPRI and adopted without changed in the CCST draft report seem questionable. Three references are given in the EPRI report, although for which claim each applies is not made clear. The first reference, the ICNIRP report, does not in fact give measured values for microwave ovens, but instead reports what the legal limit for leakage is, generally reported to be orders of magnitude above what typical exposures from microwave ovens really are. The second reference is to a 1978 paper by PG&E's consultant, RA Tell. That paper CCST has not made available for review, but it is over three decades old, and thus of little relevance to today's microwave ovens. The third reference is merely to a personal communication with Tell, without any information as to the content of that communication. When one checks the values reported by EPRI and uncritically adopted by CCST, it appears that the first value, 5 mW/cm^2 at 2 inches from the device, is in fact not a measured value of typical exposures but the vastly higher legal limit for leakage. The literature in fact indicates that 50% of microwave ovens produce less than 0.062 mW/cm^2 at 5 cm, or two orders of magnitude below the value reported by EPRI and reproduced by CCST without question. See, e.g., R, Mathes, "Radiation Emission from Microwave Ovens," *Journal of Radiation Protection,* Vol. 12, No. 3, September 1992. One presumes the leakage rate has been reduced even further since then.]

One recognizes that if one is comparing to FCC existing standards based solely on acute, thermal effects that duty cycle might be treated differently. But if there is a cancer effect, which is what the electeds asked CCST to study, a likely key aspect of the dose-response relationship is the cumulative whole body dose. For ionizing radiation, about which I have spent much of my career, the determining factor is largely how much radiation energy the body has absorbed. [There are of course other factors, such as the relative biological effectiveness (RBE) of different types of ionizing radiation and varying sensitivity of different organs.) So, if the question were how does SmartMeter and cell phone RF radiation compare to FCC limits, duty cycle may be treated in a different fashion. But since the question is what if FCC limits, based solely on thermal effects, may be inadequate to protect against cancer and other non-thermal effects, then the duty cycle—which determines the cumulative total exposure received—and whole body exposure must be factored in. My fundamental recommendation is that the draft report should be revised to correct for these two factors.

I have taken the liberty, with the help of two student assistants, to demonstrate the potential impact of some of these corrections.

Figure 1 is simply the CCST Figure 1, which in turn was largely taken from the estimates in the EPRI pamphlet. Units were simply converted by CCST from mW/cm^2 to $\mu W/cm^2$ and it corrected the duty cycle for the SmartMeter, otherwise the data are unchanged from EPRI's estimates. One will note that the estimated exposure from the cell phone is just to the ear, in direct contact with the cell phone, whereas the other comparisons, including the SmartMeter, are for whole body exposures, and that the duty cycle of the cell phone and microwave oven were not corrected. In other words, the chart compares a SmartMeter that is always on with a cell phone or microwave oven when they are being used, even though 99% of the time they are not in use. This overestimates the cumulative exposure by a factor of 100 for the cell phone and microwave oven, and dramatically skews the comparison.

Figure 2 fixes the error regarding duty cycle for the cell phone and microwave oven, markedly altering the comparison. The minimum cumulative exposure over time from the SmartMeter at 3 feet is 80 times the minimum cumulative exposure from the microwave oven and four times the minimum cumulative exposure from the cell phone, for example. This does not involve any correction of the while-on exposure values for either the cell phone or microwave oven, only the duty cycle factor.

Figure 3 provides a very rough approximation of the correction of the cell phone at the ear estimate to a whole body estimate so it is comparable to the whole body estimate for the SmartMeter. *It should be stressed that neither this estimate nor that in Figure 4 using a different approach is intended to be a definitive figure, but is intended to be exemplary of the kind of change to the comparison a detailed analysis may produce. It is my recommendation that CCST carefully measure, or at minimum thoroughly calculate, the average power density over the whole body from a cell phone held at the ear. We here have made two very rough estimates just to make the point what a far more detailed analysis may show.*

The value used for the peak cell phone power density for a cell phone held to the ear in the CCST draft report is taken directly from the EPRI pamphlet, without apparent independent review or correction. According to p. 6 of the EPRI pamphlet, the value it gives apparently is not a measured value but an estimate. How the estimate was arrived at is not detailed in the brochure. All that is said is in footnote 1, "Based on a 3-inch 250mW antenna emitting in a cylindrical wavefront." A quick calculation to try to reproduce what EPRI must have done indicates that if it merely assumed that all of the energy from a 250mW cell phone was transmitted by holding directly against the ear into a circular area with a 3 inch diameter, the power density in that small circular area around the ear would be 5 mW/cm^2. That is precisely the upper value given by EPRI in its table. We don't know if that is what EPRI did, since it doesn't tell us what it did and CCST does not appear to have tried to confirm the asserted value. But in any case, 5 mW/cm^2 from a 250mW cell phone would indeed appear to require that that power be deposited solely in that very small circular area.

Averaging over the full potentially exposed surface area of the body (presuming only half the body surface could be exposed to the cell phone from any one angle), the whole body exposure would be approximately on average 0.25 mW/cm^2 given the maximum value to the ear of 5 mW/cm^2 put forward by EPRI and the CCST draft report and correcting as well for the duty cycle. **The SmartMeter thus would produce 160 times more cumulative whole body exposure than the cell phone assuming this estimate for whole body exposure.** This is shown in Figure 3.[3]

[3] In these graphs we have used the values for a microwave oven at 2 feet put forward by EPRI and repeated by CCST even though, as discussed above, they appear questionably high. Note that measured values indicate typical measured microwave oven RF fields 5 cm from the oven are in the range of 0.062 mW/cm^2, whereas the EPRI estimates used by CCST are for comparable values 2 feet away, which, if the exposure were drop by inverse square of the distance, should be very much lower. It is unclear whether EPRI is actually referring to measured values or to the legal limits, the latter being irrelevant in this context.

Since the EPRI estimate for cell phone peak power density at the ear is unexplained as to its derivation, we have also made a very rough estimate of whole body exposure from a cell phone from an independent line of calculation. Taking the values EPRI (and thereby CCST) put forward for exposure at three feet from a 250 mW SmartMeter, and noting that EPRI assumed the cell phone would also be 250mW, one can make a rough estimate of power density for the whole body from a cell phone held at the head. The exposure at one's waist would be approximately three feet from the source, just as in the assumed case of the SmartMeter. Presuming that the dose falls off as the inverse square of the distance, a very rough estimate of power density averaged over half the surface of the whole body, and taking into account duty cycle, yields a cumulative cell phone whole body power density of roughly 0.75 $\mu W/cm^2$. **Using this way of estimating suggests the SmartMeter would produce 50 times the cumulative whole body exposure as a cell phone.** The results of this comparison are found in Figure 4.

We are here using the duty cycles proposed by CCST itself in its draft report. We recognize other duty cycles can be considered. Perhaps one should presume maximum duty cycle in the future for SmartMeters, when all additional features are incorporated, might be only 50%, for example. But other factors also need to be considered, including exposures from banks of SmartMeters attached to an apartment building, and the exposure from all the devices within a home that are planned to be constantly communicating by RF with the SmartMeter.[4]

It is strongly recommended that CCST revise the report and perform actual measurements. At minimum, revised calculations that correct for duty cycle and cumulative whole body exposure should be conducted.

[4] It is noted that EPRI claims a diminished dose in back of a bank of SmartMeters, but it is unclear that that claim can be relied upon. The particulars of the specific test done by EPRI, in connection with the manufacturer of the devices (who has an obvious interest in findings suggesting safety), are not spelled out. Furthermore, it is unclear how the SmartMeter can communicate with devices inside the home—the key purpose—if the back of the device blocks most of the signal from getting through.

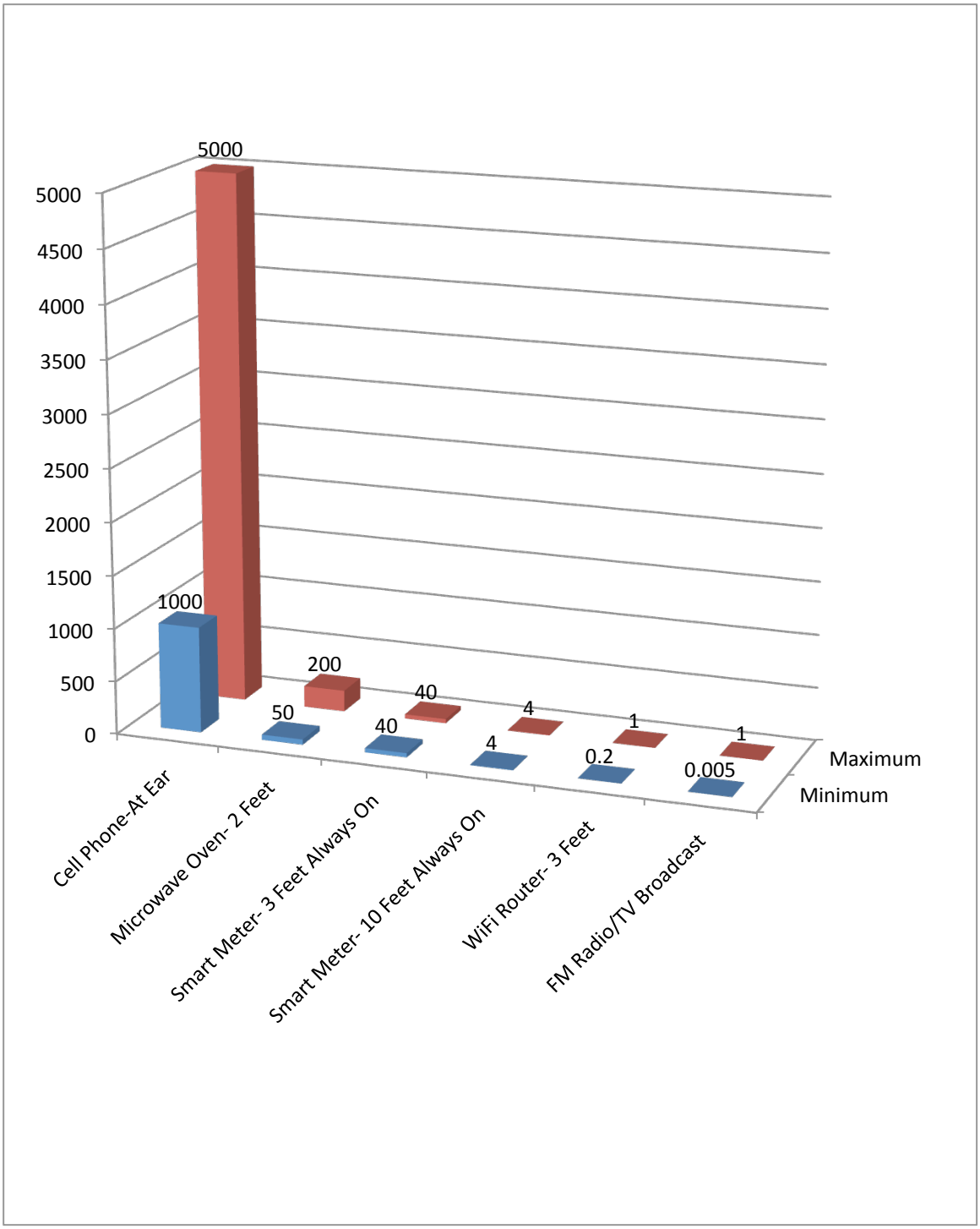

Figure 1: Graph from CCST Report in $\mu W/cm^2$—uncorrected for whole body exposure or duty cycle

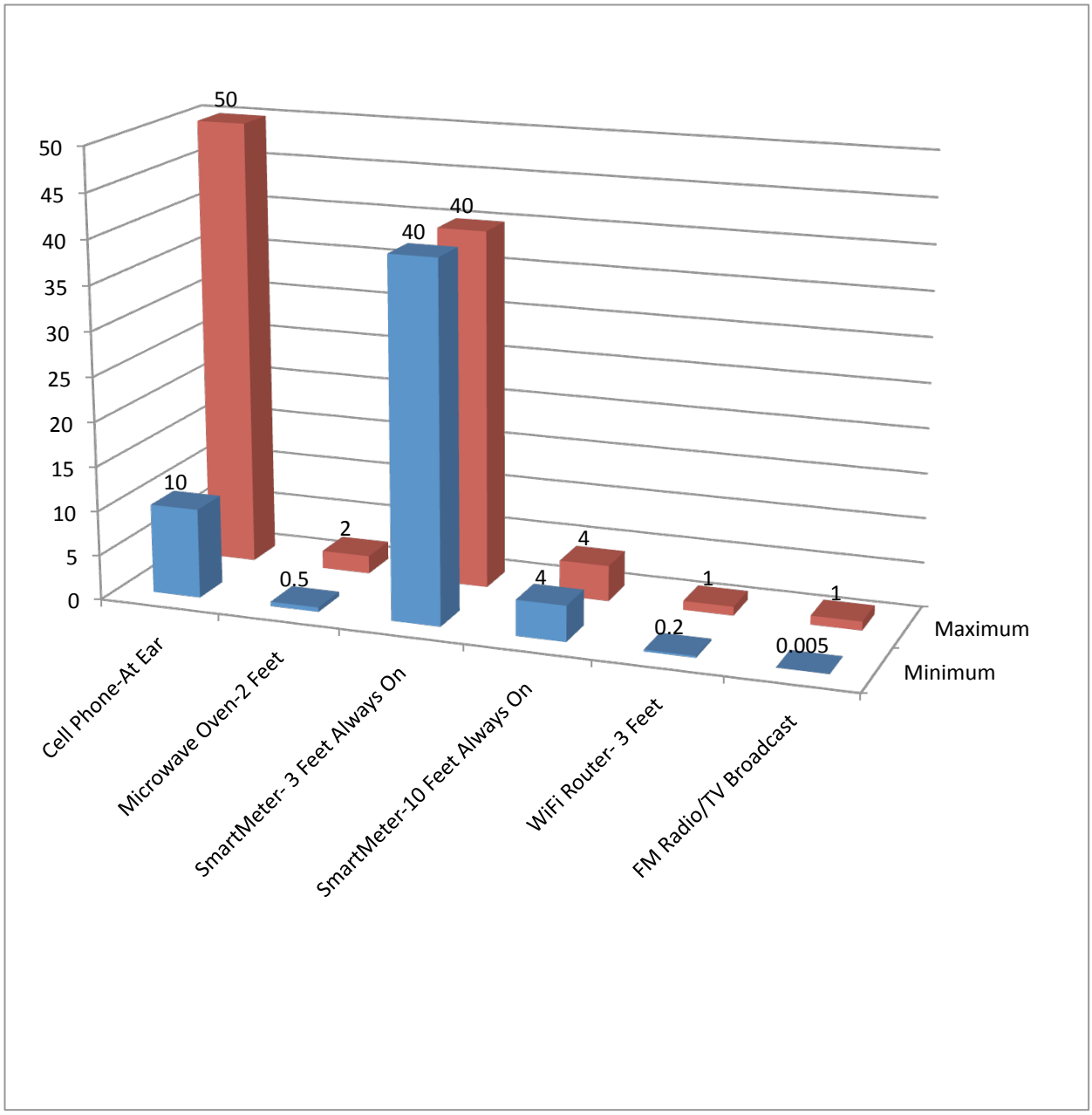

Figure 2. Comparison of Radio-Frequency Levels from Various Sources in $\mu W/cm^2$ over time [corrected only for assumed duty cycle).

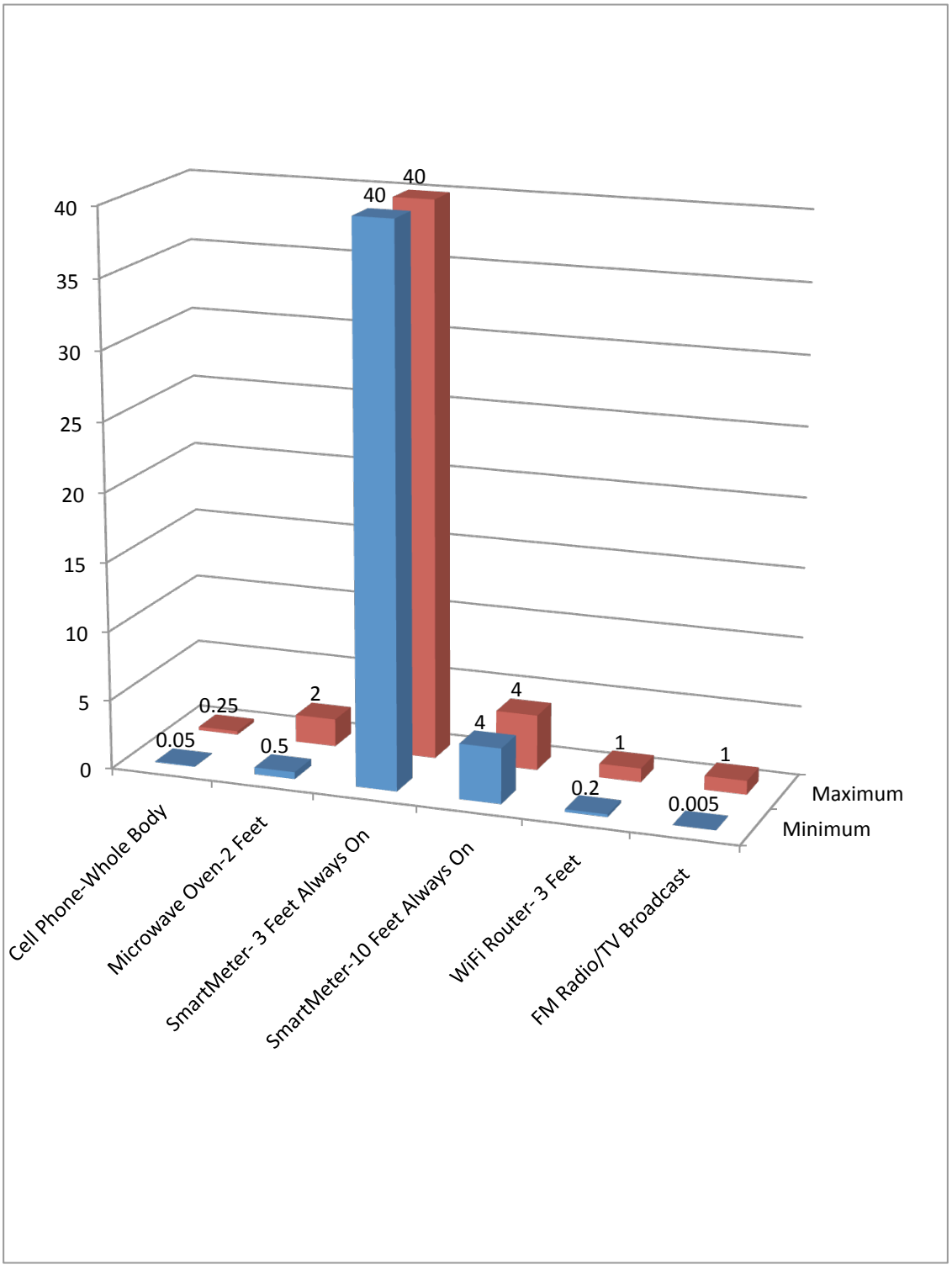

Figure 3. Comparison of Radio-Frequency Levels to the Whole Body from Various Sources in $\mu W/cm^2$ over time [corrected for assumed duty cycle and whole body exposure extrapolated from assumed cell phone dose at ear].

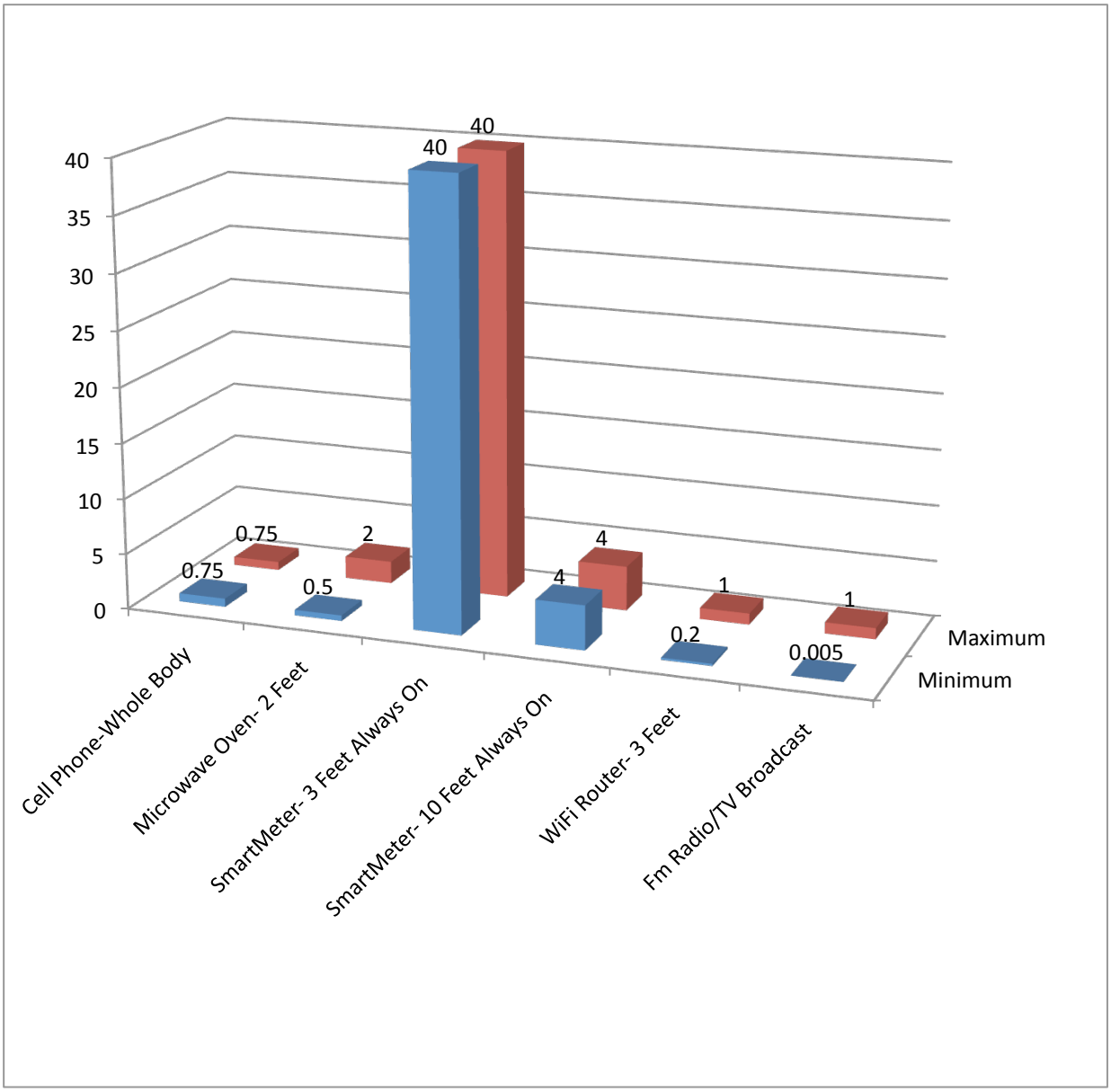

Figure 4. Comparison of Radio-Frequency Levels to the Whole Body from Various Sources in $\mu W/cm^2$ over time [corrected for assumed duty cycle and whole body exposure extrapolated from EPRI/CCST SmartMeter estimated levels at 3 feet].